



1 TRANSCRIPTION OF TAPE-RECORDED  
2 CONVERSATIONS

September 22, 2006

6 | In Re: Curly Young

**DEFENDANT'S  
EXHIBIT**

12 2/27/07  
Young

## ORIGINAL

REPORTED BY: Teresa Turquitt Davis  
Certified Court Reporter,  
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5 MR. YOUNG: Testing. Who is  
6 this?

7 (Dial tone.)

8 (Dialing phone number.)

9 (Busy signal.)

10 (Dial tone.)

11 (Dialing phone number.)

12 (Dial tone.)

13 (Dialing number.)

14 (Busy signal.

15 (Dial tone.)

16 (Dialing number.)

17 (Phone ringing.)

18 UNIDENTIFIED FEM

19 Hello.

20

20 MR. YOUNG: Yeah, is Thomas  
21 there?

22 UNIDENTIFIED FEMALE VOICE:

23 Yes. One moment, please.



1 (Tape noise.)

2 MR. YOUNG: Mr. Lauar?

3 MR. LAUAR: Yes, sir.

4 MR. YOUNG: What is up? It's

5 Curly.

6 MR. LAUAR: Hey, man. What is

7 going on?

8 MR. YOUNG: Not much, man.

9 I've got a couple of questions for you.

10 MR. LAUAR: Okay.

11 MR. YOUNG: The decal on my

12 truck, man, did Ken instruct y'all to take

13 that off?

14 MR. LAUAR: (Tape noise)

15 decal?

16 MR. YOUNG: Yeah, the

17 registration decal.

18 MR. LAUAR: (Tape noise) oh,

19 on your personal truck?

20 MR. YOUNG: Yeah.

21 MR. LAUAR: Oh, he ain't said

22 nothing to me about it.

23 MR. YOUNG: (Tape noise) oh,



1        okay, because it got taken off and --

2            MR. LAUAR: Who took it off?

3            MR. YOUNG: That is what I'm  
4 trying to find out.

5            MR. LAUAR: Oh, gosh.

6            MR. YOUNG: Yeah, tell me  
7 about it. I was trying to go out to  
8 Rucker and noticed it was gone, man, and I  
9 was like what the hell.

10           MR. LAUAR: Yeah.

11           MR. YOUNG: And it's supposed  
12 to be turned in to the registration  
13 person.

14           MR. LAUAR: Yeah.

15           MR. YOUNG: So I didn't know  
16 if you had instructed --

17           MR. LAUAR: No, I didn't know  
18 anything about that.

19           MR. YOUNG: Oh, okay. Well,  
20 y'all finally got me, man.

21           MR. LAUAR: (Tape noise) you  
22 living man.

23           MR. YOUNG: Hey, man, I'm



1 living good, man. It ain't no big deal.

2 MR. LAUAR: I heard you went  
3 to work with (tape noise) project manager  
4 thing.

5 MR. YOUNG: Oh, shit.

6 MR. LAUAR: (Laughter.)

7 MR. YOUNG: No. Hell, no.  
8 I'm at Laurel Oaks back in nursing, man,  
9 which I already-- I was getting that lined  
10 up anyways.

11 MR. LAUAR: Uh-huh.

12 MR. YOUNG: I was just trying  
13 to find out -- you always told me the  
14 truth, man. Why did Ken have such a hard  
15 dick for me, man?

16 MR. LAUAR: (Tape noise) okay,  
17 okay, just before you got in (tape noise),  
18 do you remember the incident on West  
19 Permanent {phonetic} Road with the workers  
20 (tape noise) out there?

21 MR. YOUNG: Uh, you mean with  
22 the --

23 MR. LAUAR: Yeah.



1                   MR. YOUNG: They were working  
2 on the road?

3                   MR. LAUAR: Yeah, yeah.

4                   MR. YOUNG: Yeah.

5                   MR. LAUAR: Dude came to  
6 control and (tape noise) to complain to  
7 control about, you know, the incident  
8 (tape noise) that was you. (Tape noise) I  
9 don't know if that triggered his decision  
10 or whatever. But (tape noise) like, you  
11 know, he left his number and he called  
12 them and he talked to them and (tape  
13 noise) like got all belligerent with him  
14 and everything.

15                  MR. YOUNG: No, that is not  
16 how it was.

17                  MR. LAUAR: Okay.

18                  MR. YOUNG: The joker got  
19 belligerent with me when I come around the  
20 corner.

21                  MR. LAUAR: Oh, okay.

22                  MR. YOUNG: See, I went down  
23 the tank trail. He had the sign, I think,



1 way up there almost at the Tabernacle  
2 Airfield. Well, when I left that  
3 afternoon, I went down the tank trail and  
4 went all the way out gate 42, I think, it  
5 was, and --

6 MR. LAUAR: Curly?

7 MR. YOUNG: Yeah.

8 MR. LAUAR: Did you have any  
9 of your family working at DOC, your mama  
10 or --

11 MR. YOUNG: Yeah, yeah.

12 MR. LAUAR: Oh, they did?

13 MR. YOUNG: Huh?

14 MR. LAUAR: They did?

15 MR. YOUNG: Did I have any of  
16 my family working at DOC?

17 MR. LAUAR: Yeah.

18 MR. YOUNG: During what period  
19 of time?

20 MR. LAUAR: What period of  
21 time?

22 MR. YOUNG: My mother used to  
23 work out there.



1                   MR. LAUAR: He said his mother  
2 used to work out there. (Tape noise)  
3 Barbara said she worked with your mom.

4                   MR. YOUNG: I think she did,  
5 yeah. That was a while back. Yeah, Helen  
6 Crittenden.

7                   MR. LAUAR: I think it was  
8 like '80 --

9                   MR. YOUNG: Yeah, yeah, yeah,  
10 Mom worked out there. My mother did.

11                  MR. LAUAR: He said yeah, his  
12 mom worked out there. (Tape noise) that  
13 is --

14                  MR. YOUNG: Yeah, but all this  
15 was in the works prior to because --

16                  MR. LAUAR: Yeah, I think so.

17                  MR. YOUNG: There ain't no  
18 doubt in my mind. That was just something  
19 that happened after the fact.

20                  MR. LAUAR: Right.

21                  MR. YOUNG: Because, you  
22 know --

23                  MR. LAUAR: I figured you was



1 holding, you know, (tape noise) like a  
2 trump card or something. I don't know,  
3 man.

4 MR. YOUNG: No.

5 MR. LAUAR: You don't think  
6 so?

7 MR. YOUNG: Huh?

8 MR. LAUAR: You don't think  
9 so?

10 MR. YOUNG: No, man. I mean,  
11 it's obvious -- do you remember when --

12 MR. LAUAR: Oh, it was already  
13 in the works.

14 MR. YOUNG: Oh, yeah, it was  
15 already in the works --

16 MR. LAUAR: Okay.

17 MR. YOUNG: -- because if you  
18 listen to it in the meeting that we all  
19 had --

20 MR. LAUAR: Right.

21 MR. YOUNG: -- it was about  
22 the two mannequins.

23 MR. LAUAR: Okay.



1                   MR. YOUNG: (Tape noise) that  
2 is what he had the -- you know, because it  
3 was nothing mentioned about that truck --  
4 I didn't know anything about that truck  
5 deal.

6                   MR. LAUAR: Yeah, yeah, yeah.

7                   MR. YOUNG: That came after I  
8 left.

9                   MR. LAUAR: Okay. Okay.

10                  MR. YOUNG: But what I was  
11 trying to find out is why he was always,  
12 you know, picking on me out there.

13                  MR. LAUAR: I don't know.

14 (Tape noise) I think the first incident  
15 was when he was with Bill and --

16                  MR. YOUNG: Oh, when they  
17 cross-trained me over?

18                  MR. LAUAR: They came up on  
19 you, and I don't know, they say you was  
20 asleep or something, I don't know. But I  
21 think ever since then it's sort of like,  
22 you know, he was --

23                  MR. YOUNG: He was --



1                   MR. LAUAR: Always looking  
2 out, you know, over his shoulder with you  
3 or whatever.

4                   MR. YOUNG: (Tape noise) yeah,  
5 I know it because he's always having you  
6 go out and check on me.

7                   MR. LAUAR: Well, not  
8 necessarily check on you.

9                   MR. YOUNG: Well, what about  
10 with the -- you know, the one incident  
11 with the -- I know you did it because of  
12 the -- because you told me that he -- you  
13 did it by request when the cards went out  
14 in the trucks for the -- you know, one was  
15 on the reservoir and you put them out and  
16 I asked you what was that out, and you  
17 said I was instructed to do that.

18                  MR. LAUAR: Oh, yeah, that was  
19 (tape noise) Jerry. He assumed that, you  
20 know, you wasn't performing your B-O-T-S  
21 in the morning and basically just (tape  
22 noise) just out there and then (tape  
23 noise) filling the truck up without, you



1 know, actually looking over the truck or  
2 anything. So he said well, plant -- you  
3 know, go ahead and plant something out  
4 there and see if you pick it up.

5 MR. YOUNG: Right. He's doing  
6 that just on me, see.

7 MR. LAUAR: Uh-huh.

8 MR. YOUNG: Yeah, that is what  
9 I thought.

10 MR. LAUAR: Well, everybody  
11 had something in there.

12 MR. YOUNG: Yeah, because you  
13 didn't want it to look like it was just  
14 me.

15 MR. LAUAR: Right, right.

16 MR. YOUNG: But Jerry  
17 instructed you to put it out on me, didn't  
18 he? I thought so.

19 MR. LAUAR: Yeah.

20 MR. YOUNG: Yeah. I was just  
21 curious, man. Because, you know, as far  
22 as the overall work performance now, I  
23 mean, why didn't they ever put that in



1 the -- in my C-I-S? You know, it was  
2 never bad in the C-I-S. It was always, you  
3 know, maybe one thing, but I was always  
4 above standard. But yet, you know, here  
5 in the last three to six months --

6 MR. LAUAR: Right.

7 MR. YOUNG: -- they started  
8 nitpicking and, you know, writing -- Jerry  
9 is writing up a minute late, you know,  
10 which is a crock.

11 MR. LAUAR: I think he was  
12 running any infraction or any incident  
13 that was, you know, out of what was  
14 supposed to be, he was documenting it, I  
15 believe.

16 MR. YOUNG: Who, Jerry?

17 MR. LAUAR: Yeah.

18 MR. YOUNG: Yeah, I know he  
19 was.

20 MR. LAUAR: Yeah.

21 MR. YOUNG: Yeah, because  
22 Jerry and I -- you know, when that  
23 incident where he drummed up that stuff



1 with the grounds?

2 MR. LAUAR: Right.

3 MR. YOUNG: You know, I told  
4 him then, I said look, you know, if you  
5 have got a problem with my performance,  
6 you need to go ahead and terminate me.  
7 And his statement was all right, and that  
8 is when he came to you and wrote that  
9 statement up. Do you remember?

10 MR. LAUAR: I remember.

11 MR. YOUNG: Well, he's --  
12 between him and the grounds down there,  
13 they conjured up all that dang BS to begin  
14 with and then it went on out in the field.

15 And then Pat got it where it  
16 was violence in the workplace, which I  
17 don't know where that came from.

18 MR. LAUAR: (Laughter.)

19 MR. YOUNG: I mean, come on.

20 MR. LAUAR: (Laughter.)

21 MR. YOUNG: You know what I am  
22 saying?

23 MR. LAUAR: They said you was



1 going to kick their ass or something.

2 MR. YOUNG: No, man, that  
3 ain't what was said. You know, all was  
4 said was, you know, I got out and told him  
5 what had happened with Jerry.

6 MR. LAUAR: Yeah.

7 MR. YOUNG: All right. And,  
8 you know, I said look, you know, I don't  
9 know, I know how Jerry is, I just want to  
10 know did you guys say that I didn't do any  
11 work in cut.

12 Pat goes no, no, let me tell  
13 you what happened. Jerry always comes up  
14 at the last minute and he wants us to go  
15 down here and change our plans and we just  
16 ain't doing it, you know. I said well, I  
17 just wanted you to know that if, you know,  
18 you all said that, I told Jerry y'all are  
19 a bunch of lying mother fuckers is what I  
20 told you.

21 MR. LAUAR: Right.

22 MR. YOUNG: I said but if you  
23 didn't say that, you know, I'm offering



1 you an apology. But I want you to know  
2 that is what I told Jerry. No, we didn't  
3 say that. You know, all of them were down  
4 there. No, man, that ain't what was said.  
5 You know, and they went on about that.

6 And I said well, I'll tell you  
7 like this, you know, I'm 320 pounds and  
8 46 years old, I can hang with the best of  
9 you guys, you know, weed eating, and that  
10 is what I said.

11 MR. LAUAR: Uh-huh.

12 MR. YOUNG: Now, where I could  
13 kick their ass at, I don't know where that  
14 came up. But, see, when it all came down  
15 to the nut-cutting --

16 MR. LAUAR: Uh-huh.

17 MR. YOUNG: I told Pat -- you  
18 know, Ken had me up for termination then.

19 MR. LAUAR: Oh, really?

20 MR. YOUNG: Yeah. He had -- I  
21 went in to sign the pay -- I went in and  
22 he threw this paper down at me and says  
23 this is for -- you know, you are going up



1 for termination, you can rebut it, I have  
2 already talked to HR, but, you know, this  
3 is violence in the workplace, we ain't  
4 having it, I have got two statements,  
5 yack, yack, yack.

6 And I said, man, I didn't say  
7 that, you know. And he's like well, I  
8 have got two signed statements, you know,  
9 you are going up.

10 And I said look, I'll tell you  
11 what you do, I said you call Jimmy Hines  
12 in here and you ask him. If he says I  
13 said what you say I did would threaten  
14 him, I'll give you my resignation.

15 MR. LAUAR: Right.

16 MR. YOUNG: Ken goes all  
17 right. So he calls him in there, and  
18 Jimmy tells him no. Jerry stands up and  
19 goes oh, no, wait a minute, now, you know,  
20 Jimmy is a pretty big boy, he wouldn't  
21 feel threatened, ask some of them -- the  
22 little guys.

23 MR. LAUAR: Uh-huh.



1 MR. YOUNG: So he says all  
2 right, call them in. Well, they called  
3 Chris in there. Chris, come to find out,  
4 was one of the ones that signed that  
5 statement. Well, they asked Chris and  
6 Roger did that happen and were they  
7 threatened, and they said no, that ain't  
8 what happened and I didn't feel  
9 threatened.

10 So Ken is standing there with  
11 his paper looking at -- looking  
12 dumbfounded, you know. So Ken goes well,  
13 I guess there ain't nothing to this. You  
14 know, this is bogus. And I said so it's  
15 over, and he said yeah, as far as I'm  
16 concerned, this is over.

17 Well, Jerry and Roger then  
18 started getting into it because Jerry  
19 tried to say that the grounds started the  
20 shit. And Roger told him he was full of  
21 shit and that he needed to quit lying. So  
22 they were getting into a  
23 knock-down-drag-out out in there



1 MR. LAUAR: Uh-huh.

2 MR. YOUNG: But, I mean that  
3 is where in my -- where Ken -- he got  
4 showed up right there because they proved  
5 him. Then corporate got into it because I  
6 called -- yeah, you gave me the number  
7 after that.

8 MR. LAUAR: Uh-huh.

9 MR. YOUNG: And I called  
10 Carol. Well, because of the nature of the  
11 allegation, corporate had to get involved.

12 Well, they launched an  
13 independent review on that deal and took  
14 two weeks to get that back.

15 Well, when they came down, Jim  
16 Garrett and Carol, that is when they told  
17 me the findings that there was nothing to  
18 it, won't nothing be in your file, you  
19 know, we apologize and, you know, Ken  
20 doesn't have the authority to fire you,  
21 not like that.

22 And I said well, that is what  
23 he was doing. And she goes well, no, he's



1 got to go through HR. So that is when Ken  
2 started drumming up -- every time you  
3 turned around, he was documenting or  
4 drumming up something to get rid of me,  
5 and that is where he was going to show me  
6 because he had made the statement in there  
7 on the grounds that he don't get mad, he  
8 gets even.

9 MR. LAUAR: Hum.

15 MR. LAUAR: You doing all  
16 right then?

17 MR. YOUNG: Well, yeah. You  
18 know I was ready to go anyways --

19 MR. LAUAR: Uh-huh.

20 MR. YOUNG: -- because, you  
21 know, I couldn't take too much more of the  
22 BS because it was ridiculous. Every time  
23 I turned around, I was violating -- you



1 know, saying I was violating a policy  
2 when, you know, Chris and Calvin, they  
3 cost the company award fee money. I never  
4 once cost award fee money.

5 MR. LAUAR: Right.

6 MR. YOUNG: You know, but yet  
7 they want to say I'm violating policies.  
8 But, you know, I never did -- you know,  
9 through the whole time I was there, I  
10 never cost the company any money on the  
11 award fee.

12 MR. LAUAR: Uh-huh.

13 MR. YOUNG: So why do I get  
14 nailed? Well, it's obvious. Ken had it  
15 up for me. So -- but I thought maybe you  
16 had some insight as to why he actually had  
17 it, but --

18 MR. LAUAR: No, no.

19 MR. YOUNG: (Tape noise) I  
20 mean, he just was pretty hard. And for  
21 him to say two mannequins, you know, that  
22 is ridiculous, man.

23 MR. LAUAR: Yeah.



1                   MR. YOUNG: And you know it  
2 is.

3                   MR. LAUAR: Yeah.

4                   MR. YOUNG: Because, you know,  
5 you took thirty-five up there and never  
6 posted them into the books. But yet he's  
7 saying there is two miscounted for --

8                   MR. LAUAR: Uh-huh.

9                   MR. YOUNG: -- and he's going  
10 to terminate me on an inaccurate  
11 accountability of government -- now, what  
12 kind of shit is that? So, you know -- you  
13 know what I'm saying?

14                  MR. LAUAR: I thought you -- I  
15 thought I told you to (tape noise) post  
16 those the ones that was outside the (tape  
17 noise) up there in the shed. I thought I  
18 told you to post them.

19                  MR. YOUNG: You put them up  
20 there for about -- they were up there  
21 for -- I wasn't even here that week.

22                  MR. LAUAR: Uh-huh.

23                  MR. YOUNG: So you had already



1 had them posted in -- I mean, up there at  
2 the place.

3 MR. LAUAR: Right.

4 MR. YOUNG: And then when I  
5 came back, I -- you mentioned it to me  
6 that you had put some up there, I think.

7 MR. LAUAR: Right.

8 MR. YOUNG: But I didn't know  
9 when, because I was out that week. You  
10 were up there doing something at MPMG and  
11 you took them up there.

12 MR. LAUAR: Yeah, I was --

13 MR. YOUNG: I think I was on  
14 my suspension week during that time maybe.

15 MR. LAUAR: Right.

16 MR. YOUNG: And, you know, but  
17 you had them up there for probably three  
18 or four days before you told me. Because  
19 at one time, you had mentioned to me that  
20 you were going -- we were going to do  
21 something with them, but they had the  
22 holes in them.

23 And then the next thing I knew



1 is you had -- you come back later on and  
2 told me that -- I think you might have  
3 went out there and did some work or --

4 MR. LAUAR: Yeah, I was  
5 putting the ones that was damaged out in  
6 the field.

7 MR. YOUNG: That is right  
8 because you told me you put two or three  
9 of them out there in the field.

10 MR. LAUAR: I put, I think, a  
11 lot of them, you know, in certain areas  
12 that were sagging and broken.

13 MR. YOUNG: Right, that is  
14 right.

15 MR. LAUAR: And I documented  
16 those.

17 MR. YOUNG: Right.

18 MR. LAUAR: And then I told  
19 you to go ahead and (tape noise) post the  
20 rest of them to your P-0.

21 MR. YOUNG: Okay. Well, that  
22 is what I was getting at is when I was  
23 talking to him, he was trying to get me



1 for two of them not being accurate  
2 accountability, which there is no limit  
3 that is being posted as far as when they  
4 had to get in there, just in a reasonable  
5 time, you need to get them posted.

6 MR. LAUAR: Right.

7 MR. YOUNG: Okay. Well, you  
8 know, all I was saying with you is that  
9 you have put them up there and it was  
10 three to four days before they got posted.

11 MR. LAUAR: Right.

12 MR. YOUNG: Okay. You know,  
13 but you put them in there, you could have  
14 posted them to the book up there.

15 MR. LAUAR: Well, nobody else  
16 has a key but -- you know, but you.

17 MR. YOUNG: Yeah, but you put  
18 them in the building. I didn't.

19 MR. LAUAR: Naw, I --

20 MR. YOUNG: You went back  
21 later on --

22 MR. LAUAR: I didn't put them  
23 in the building.



1                   MR. YOUNG: Wait, I know what  
2   happened. You put them up there and they  
3   were outside for a long time.

4                   MR. LAUAR: Right.

5                   MR. YOUNG: And then you went  
6   back later on and put them inside the  
7   building, didn't you?

8                   MR. LAUAR: Somebody else may  
9   have put them in there. (Tape noise) it  
10   wasn't me.

11                  MR. YOUNG: (Tape noise) I  
12   wonder who it was.

13                  MR. LAUAR: (Inaudible) (tape  
14   noise).

15                  MR. YOUNG: I remember that,  
16   now.

17                  MR. LAUAR: Yeah. (Tape  
18   noise). It wasn't me. You know, I  
19   remember telling you to post them to your  
20   P-L-L as sod and --

21                  MR. YOUNG: Well, I'll tell  
22   you something else, you know, even though  
23   they were telling me to post it, no one



1 really told me -- you know, I had to come  
2 back to you.

3 MR. LAUAR: Right.

4 MR. YOUNG: And say, hey, man,  
5 where is it getting put into the database  
6 at? Because even though we are posting  
7 them and putting them -- when I go in and  
8 document that I had them -- I had done  
9 them on a location, the count was coming  
10 off because they were never initially  
11 inputted. You know, like the thirty-five,  
12 you know, they had to be -- you had to  
13 bring up by bin number and then add that  
14 R-T-N; is that what it was? Do you know  
15 what I am talking about?

16 MR. LAUAR: Uh-uh.

17 MR. YOUNG: You know when I  
18 put thirty-five in, I have to bring it up  
19 by the bin number and then add it back to  
20 the total number that is being used. Then  
21 you will have an accountability for that  
22 usage. You know what I'm saying?

23 MR. LAUAR: Oh, yeah.



1                   MR. YOUNG: And, see, no one  
2 had told me that shit.

3                   MR. LAUAR: Right.

4                   MR. YOUNG: But that is how --  
5 you know, the first time that I was told  
6 that that is what needed to be done was  
7 when you did it. So, therefore, all those  
8 times when I was -- I would take  
9 thirty-five out to CPQC, take so many out  
10 to MPMG, they never got put into the  
11 database as out there to be taken off.  
12 You know what I'm saying?

13                  MR. LAUAR: Right.

14                  MR. YOUNG: They were being  
15 documented on a 3318 out on the field.  
16 But when you come back to the database,  
17 those thirty-five were never inputted  
18 into -- and so there at the end that last  
19 week I was there, I kind of caught that  
20 and I started trying to remember when I  
21 put the thirty-five out so I could go  
22 back. Because, like I said, you were the  
23 first one that showed me that I was



1 supposed to put -- where to -- how to put  
2 them back into the database.

3 MR. LAUAR: Right.

4 MR. YOUNG: And -- but it's  
5 probably messed up now anyways, but I  
6 don't know.

7 But anyways, I just wanted to  
8 drop a line and see if I could get some  
9 closure to why he had such a hard penis  
10 for me.

11 MR. LAUAR: (Laughter.)

12 MR. YOUNG: I know Jerry did,  
13 you know, that is just -- me and Jerry  
14 been on that on -- for a long time on the  
15 outs and he put it in to get me any way he  
16 could, I already knew that. But I had  
17 tried to battle it. But, you know, so be  
18 it (tape noise).

19 MR. LAUAR: I've got to go put  
20 this damn bread in the oven, man.

21 MR. YOUNG: Oh, you cooking,  
22 man?

23 MR. LAUAR: Yeah.



1                   MR. YOUNG: (Tape noise) all  
2 right, man. I just wanted to drop it,  
3 but --

4                   MR. LAUAR: Okay.

5                   MR. YOUNG: All right. You  
6 take care, dude.

7                   MR. LAUAR: All right, man.

8                   MR. YOUNG: All right. Later.

9                   MR. LAUAR: All right.

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11                   END OF RECORDING ON SIDE A

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